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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

LOR PAO VUE,

Plaintiff,

vs.

KILOLO KIJAKAZI, Acting  
Commissioner of Social Security,

Defendant.

Case No. 1:22-cv-00110-ADA-BAM  
STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF  
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 3-day extension of time, from September 13, 2022 to September 16, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time. Counsel for the Plaintiff returned this weekend from Texas after being out several weeks attending to an emergency with her ill father. (see attached declaration). As Counsel has just

1 recently returned, additional time will be needed to ensure the timely filing of  
2 many merit briefs that are already on multiple extensions.

3 Counsel requires additional time to brief the issues on this matter  
4 thoroughly for the Court's consideration. Plaintiff makes this request in good faith  
5 with no intention to further delay this matter. Defendant does not oppose the  
6 requested extension. Counsel apologizes to the Defendant and Court for any  
7 inconvenience this may cause.

8  
9 Respectfully submitted,

10 Dated: September 12, 2022 PENA & BROMBERG, ATTORNEYS AT LAW  
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12 By: /s/ Dolly M. Trompeter  
13 DOLLY M. TROMPETER  
14 Attorneys for Plaintiff  
15

16 Dated: September 12, 2022 PHILLIP A. TALBERT  
17 United States Attorney  
18 PETER K. THOMPSON  
19 Acting Regional Chief Counsel, Region IX  
20 Social Security Administration  
21

22 By: \*/s/ Ellinor R. Coder  
23 Ellinor R. Coder  
24 Special Assistant United States Attorney  
25 Attorneys for Defendant  
26 (\*As authorized by email on September 12, 2022)  
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**ORDER**

Pursuant to the parties' stipulation, and cause appearing, Plaintiff's request for a brief extension of time to file a Motion for Summary Judgment is GRANTED. Plaintiff shall file a Motion for Summary Judgment on or before September 16, 2022. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: September 13, 2022

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE